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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK Case No.

11-CIV-7633-(PAC)-(HBP)

INES FIGUEROA

Plaintiff

v.

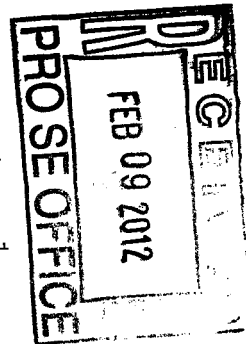
PONCE DE LEON FEDERAL BANK

Defendant

REPLY AFFIRMATION IN
SUPPORT OF MOTION

I, Ines Figueroa, affirm under penalty of perjury that:
(name)

1. I, Ines Figueroa, am the plaintiff in the above entitled action, and submit this affirmation in further support of my motion to this Court for an order a trial for justice in the case which defendant failed to admit and report that after practicing one Age Discrimination on September 19, 2005 and reacted intentionally when receiving the legal complaint and at the one year anniversary again promoted a second younger, newer and well trained employee (which both promotion they made sure that I was present as part of the humiliation and in the presence of several employees). Retaliation was reported. Defamation of Character was ignored which was one of the main practice against me along with the Harassment and accusations received by the Supervisors which were protected by the Bank. This case Was a Fraud from different angles and intentional defendant legal Misrepresentation took place. The individuals in charge of the case made sure that no action in the case took place, instead Abuse of Power overtook instead of "Justice." The settlement I accepted was under the oppression and suppression that due to the psychological abuse I was still experiencing while I was trying to work and dealing with unfair treatment from different individuals. I thought and still think about my life and my family which I have felt afraid at some point because of me trying to defend myself. The statute of limitation I was aware of this is



why I tried to report as you can see my letters and statement and I was incredibly ignored. No Lawyer wanted this case due to the mess that was abusively created. Ethics, were violated from file left and right. (please refer to the misfiled original and the amendment). The Division of Human Rights Lawyer told me that I had five years after the settlement which are not over yet. Also, a Lawyer and the only one that took his time (on October 2011) and kindly advised me to visit the Pro-se Office and that I had until October 2012 to be able to file Federal before time expired. This Lawyer was not able to represent me, but it has been the only one who had empathized with my case. I am **asking** you Honorable Judge to reconsider an investigation and find out how much of the truth I am stating in order to do Justice. Yes, this whole abuse as a consequence affected me since I was a human being and not an animal.

WHEREFORE, I respectfully request that the Court grant my motion, as well as such other and further relief as may be just and proper. **I declare under of perjury that the foregoing is true and correct.**

Dated: BRONX, NEW YORK

February 6, 2012

Signature: 

Address: 1001 Jerome Avenue, (9-A)

Telephone Number: (718) 588-1941

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Ives Figueroa

(In the space above enter the full name(s) of the plaintiff(s)/petitioner(s).)

- against -

Ponce De Leon Federal Bank

(In the space above enter the full name(s) of the defendant(s)/respondent(s).)

11 Civ. 7633 PAC ADD

AFFIRMATION OF SERVICE

I, Ives Figueroa, declare under penalty of perjury that I have
(name)
served a copy of the attached Reply to Defendant's motion, + Attachment
(document you are serving)
upon Peter A. Halperin whose address is _____
(name of person served)
1251 Avenue of the Americas, New York, NY.
(where you served document)
by Hand Delivered
(how you served document: For example - personal delivery, mail, overnight express, etc.)

Dated: New York, NY
(town/city) (state)
February 09, 2012
(month) (day) (year)

Ives Figueroa
Signature
1001 Jerome Ave. (9A)
Address
Bronx, NY
City, State
10452
Zip Code
718-588-1941
Telephone Number